

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

IN RE:

RANA JUANITA MEEKS,

DEBTOR,

CASE No. 20-10738
CHAPTER 7

RANA JUANITA MEEKS,

PLAINTIFF,

V.

ADV. No.

U.S. DEPARTMENT OF EDUCATION; NAVIENT
SOLUTIONS, LLC; KEYBANK NATIONAL
ASSOCIATION; MUFG UNION BANK,
NATIONAL ASSOCIATION; AMERICAN
EDUCATION SERVICES; LOAN SCIENCE, LLC;
NELNET SERVICING, LLC; NELNET, INC.;
FIRSTMARK SERVICES; GREAT LAKES
EDUCATIONAL LOAN SERVICES, INC.;

DEFENDANTS.

COMPLAINT

COMES NOW the Plaintiff, Rana Juanita Meeks, by and through her counsel of record, Ron D. Brown and R. Gavin Fouts of the Brown Law Firm, P.C., and alleges as follows:

I. PRELIMINARY STATEMENT

The Debtor seeks a declaration that certain student loan debts are “educational loans” and the collection of which would constitute an undue hardship for the Debtor and should be discharged pursuant to 11 U.S.C. § 523(a)(8).

II. JURISDICTION AND VENUE

1. This Adversary Proceeding is brought under Case No. 20-10738.
2. The Court has jurisdiction over this action under 28 U.S.C. § 1334.

3. This is a core proceeding according to 28 USC §157(b)(2)(I).
4. This adversary proceeding is authorized by Bankruptcy Rule 4007(a).
5. Venue is proper in this district pursuant to 28 U.S.C. § 1409(a).

III. FACTUAL ALLEGATIONS

6. Plaintiff is an individual and a resident of this district.
7. Plaintiff filed a Voluntary Petition for relief under Chapter 7 of Title 11 on April 30, 2020, in the United States Bankruptcy Court for the Northern District of Oklahoma, Case No. 20-10738, *In re Rana Juanita Meeks* (the “**Bankruptcy Case**”).
8. Debtor identified “AES/Keybank” as an unsecured, nonpriority creditors on her filed Scheduled E/F and described the related debt as “Student Loans.”
9. Debtor identified “FM/Loan Science” as an unsecured, nonpriority creditors on her filed Scheduled E/F and described the related debt as “Student Loan.”
10. Debtor identified “USDOE/GLELSI” as an unsecured, nonpriority creditors on her filed Scheduled E/F and described the related debt as “Student Loans.”
11. Plaintiff received a discharge in the Bankruptcy Case on August 11, 2020.
12. Defendant U.S. Department of Education (“**USDOE**”) is a cabinet-level department of the government for the United States of America.
13. Defendant KeyBank, National Association (“**KeyBank**”), is a private lender engaged in the practice of advancing private student loans; KeyBank is neither an agency of the United States of America nor sponsored by any agency of the United States of America.
14. Defendant MUFG Union Bank, National Association (“**MUB**”), is a private lender engaged in the practice of advancing private student loans; MUB is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

15. Defendant Navient Solutions, LLC (“**Navient**”), is a debt collection firm specializing in student loan debt; Navient is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

16. Defendant Loan Science, LLC (“**Loan Science**”), is a debt collection firm specializing in student loan debt; Loan Science is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

17. Defendant American Education Services (“**AES**”) is a debt collection firm specializing in student loan debt; AES is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

18. Defendant Nelnet Servicing, LLC (“**Nelnet Servicing**”) is a debt collection firm specializing in student loan debt; Nelnet Servicing is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

19. Defendant Nelnet, Inc. (“**Nelnet, Inc.**”) is a debt collection firm specializing in student loan debt; Nelnet, Inc. is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

20. Defendant Firstmark Services (“**Firstmark**”) is a debt collection firm specializing in student loan debt; Firstmark is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

21. Defendant Great Lakes Educational Loan Services, Inc. (“**Great Lakes**”) is a debt collection firm specializing in student loan debt; Great Lakes is neither an agency of the United States of America nor sponsored by any agency of the United States of America.

22. Defendants are the current owner and/or servicer of certain loans incurred by Plaintiff in the course of Plaintiff’s education.

IV. FIRST CLAIM FOR RELIEF:

Declaration that any obligation to all Defendants should be discharged as an undue hardship pursuant to 11 U.S.C. § 523(a)(8).

23. Repayment of all loans owed to Defendants would qualify as an undue hardship to the Debtor and should be determined as being discharged in the Debtor's bankruptcy case.

WHEREFORE, the Debtor demands judgment:

- (i) all loans to the Defendants are dischargeable pursuant to 11 U.S.C. § 523(a)(8),
and
- (ii) for such other and further relief as the Court may deem just and proper.

DATED: March 6, 2023

Respectfully submitted,
Brown Law Firm, P.C., by:

/s/ Ron D. Brown

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